

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

| | | |
|-------------------------------------|---|------------------------|
| In Re Seized Property described as: |) | Misc No: 6:23-mc-00256 |
| |) | |
| United States Currency |) | |

UNITED STATES' MOTION TO SEAL
EX PARTE MOTION TO EXTEND NOTICE DEADLINE,
AND ORDER EXTENDING NOTICE DEADLINE

The United States of America, by and through its undersigned Assistant United States Attorney, hereby moves this Court to seal the United States' Ex Parte Motion to Extend Notice Deadline, the Order Extending Notice Deadline, and attachments. The Court has the inherent authority to seal these documents. *See Baltimore Sun v. Goetz*, 886 F. 2d 60 (4th Cir. 1988). The purpose of the Government's request is to protect the information contained within these documents and to avoid the disclosure of the investigation at this time.

Based on the facts in the declaration, there is reason to believe that disclosure of the information in these documents would seriously jeopardize the investigation including by giving targets the opportunity to destroy or tamper with evidence, change patterns of behavior, flee from prosecution, intimidate cooperating and potential witnesses, dissipate assets, and endanger the safety of law enforcement and other individuals. For these reasons, the Government submits that the interests in sealing the motion, order and attachments thereto outweigh the common-law public right of access and that sealing is "essential to preserve higher values." *See Media Gen. Operations, Inc. v. Buchanan*, 417 F.3d 424, 429-31 (4th Cir. 2005). The Government further submits that, by sealing only the motion, order and attachments the denial of access is narrowly tailored to serve the Government's interests in sealing. *Id.* at 429.

Based on the foregoing, the Government requests that the United States' Ex Parte Motion to Extend Notice Deadline, the Order Extending Notice Deadline, and attachments, be filed under seal except as to employees, contract employees, and agents of the United States Attorney's Office for the District of South Carolina and the United States Department of Homeland Security.

Respectfully submitted,

ADAIR F. BOROUGHS
UNITED STATES ATTORNEY

BY: s/ Carrie Fisher Sherard
Carrie Fisher Sherard (Fed I.D. #10134)
Assistant United States Attorney
United States Attorney's Office
55 Beattie Place, Suite 700
Greenville, South Carolina 29601

Greenville, South Carolina
April 19, 2023